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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California
corporation, *et al.*,¹

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**NOTICE OF HEARING ON MOTION OF
DEBTORS FOR ORDER (I) AUTHORIZING
POST-PETITION INTERDEBTOR LENDING
PURSUANT TO SECTION 364 OF THE
BANKRUPTCY CODE; (II) GRANTING
ADMINISTRATIVE EXPENSE CLAIMS; AND
(III) GRANTING RELATED RELIEF**

Date: July 11, 2025

Time: 11:00 a.m. (Pacific Time)

Place: (In Person or Via Zoom)

United States Bankruptcy Court
1300 Clay Street, Courtroom 215
Oakland, CA 94612

Objection Deadline: July 3, 2025

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

1 **TO THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED**
2 **STATES TRUSTEE, THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,**
3 **AND OTHER PARTIES IN INTEREST:**

4 **PLEASE TAKE NOTICE** that on August 6, 2024, Windscape Apartments, LLC filed a
5 voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy
6 Code”) in the United States Bankruptcy Court for the Northern District of California (Santa Rosa
7 Division) (the “Bankruptcy Court”).

8 **PLEASE TAKE FURTHER NOTICE** that on September 12, 2024, LeFever Mattson, a
9 California corporation (“LeFever Mattson”), and 57 affiliated entities (the “September 12
10 Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

11 **PLEASE TAKE FURTHER NOTICE** that on October 2, 2024, Pinewood
12 Condominiums, LP and Ponderosa Pines, LP, both affiliates of LeFever Mattson, filed voluntary
13 petitions for relief under chapter 11 of the Bankruptcy Code (the “October 2 Debtors,” and
14 collectively with Windscape Apartments, LLC and the September 12 Debtors, the “Debtors”). The
15 bankruptcy cases of the Debtors are being jointly administered for procedural purposes only (the
16 “Chapter 11 Cases”).

17 **PLEASE TAKE FURTHER NOTICE** that on June 20, 2025, the Debtors filed the
18 *Motion of Debtors for Order (I) Authorizing Post-Petition Interdebtor Lending Pursuant to*
19 *Section 364 of the Bankruptcy Code; (II) Granting Administrative Expense Claims; and*
20 *(III) Granting Related Relief* (the “Motion”).²

21 **PLEASE TAKE FURTHER NOTICE** that, through the Motion, the Debtors seek
22 authority for LeFever Mattson to obtain new post-petition financing (the “Interdebtor Lending”) pursuant to new borrowing from subsidiary Debtors Bishop Pine, LP (“Bishop Pine”), Hagar Properties, LP (“Hagar Properties”), and Red Oak Tree, LP (“Red Oak Tree,” and, together with Bishop Pine and Hagar Properties, the “Lending Debtors”) in an initial amount of \$950,000, and a maximum aggregate amount of up to \$3,050,000 subject to the receipt of additional unencumbered cash from property sales in the next few months, on the terms and conditions set forth in the draft promissory note (the “Interdebtor Promissory Notes,” attached as Exhibit 1 to the Proposed Order attached to the Motion) by and between Debtor LeFever Mattson and the Lending Debtors, pursuant to the terms as further detailed in the Motion. The Debtors also seek authorization as part of the Interdebtor Lending of \$400,000 in post-petition lending from Debtor Beach Pine LP (“Beach Pine,” also to be considered a Lending Debtor) to LeFever Mattson undertaken in November and December 2024 as lending in the ordinary course of the Debtors’ business. The Interdebtor Lending is for working capital and general corporate purposes during the Chapter 11 Cases to meet the Debtors’ expenses until more properties can be sold, without having to borrow from external lenders on significantly more expensive terms.

23 **PLEASE TAKE FURTHER NOTICE** that the hearing on the Motion has been set for
24 **July 11, 2025, at 11:00 a.m. (Pacific Time)**, before the Honorable Charles Novack, United States
25 Bankruptcy Judge.

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28 ² Capitalized terms used but not defined herein shall have the meanings given to them in the Motion.

1 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Bankruptcy Local Rule
2 9014-1(c)(2), any objections to granting the Motion must be filed with the Bankruptcy Court and
served on counsel to the Debtors no later than **July 3, 2025**.

3 **PLEASE TAKE FURTHER NOTICE** that counsel, parties, and other interested parties
4 may attend in person in Courtroom 215 in Oakland, by Zoom video, or by Zoom telephone.
5 Additional information is available on Judge Novack's Procedures page on the Bankruptcy Court's
6 website, and information on how to attend the hearing by Zoom will be included with each calendar
7 posted under Judge Novack's Calendar on the Bankruptcy Court's website. If you have questions
about how to participate in a video or telephonic hearing, you may contact the court by calling
888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website at
8 www.canb.uscourts.gov.

9 **PLEASE TAKE FURTHER NOTICE** that a copy of the Motion and its supporting
10 documents can be viewed and/or obtained by: (i) accessing the Bankruptcy Court's website at
11 <http://www.canb.uscourts.gov>, (ii) contacting the Office of the Clerk of the Court at 450 Golden
Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' claims and noticing agent, KCC
12 dba Verita Global, at the following web address: <https://www.veritaglobal.net/LM>, or by calling
(877) 709-4751 (toll free) for U.S. and Canada-based parties; or (424) 236-7231 for International
13 parties or by e-mail at: www.veritaglobal.net/lm/inquiry. Note that a PACER password is needed
to access documents on the Bankruptcy Court's website.

14 Dated: June 20, 2025

KELLER BENVENUTTI KIM LLP

By: /s/ Thomas B. Rupp

Thomas B. Rupp

*Attorneys for the Debtors and Debtors in
Possession*